

From: [Eric Blischke](#)
To: [ricka@bes.ci.portland.or.us](#); [Jim.McKenna@portofportland.com](#); [rjw@nwnatural.com](#)
Cc: [grevelas@integral-corp.com](#); [laurakennedy@kennedyjenks.com](#); [johnt@windwardenv.com](#); [Chip.Humphrey](#);
[Dana.Davoli](#); [POULSEN Mike](#)
Subject:
Date: 10/15/2007 12:11 PM
Attachments: [Round 3B bass composites.xls](#)

All, EPA's proposal for bass compositing is presented in the attached spreadsheet. Recently, LWG representatives have raised concerns about the proposed compositing approach. Specifically, that the compositing approach is not consistent with the data quality objectives, differs from what was done during the Round 1 biota tissue sampling effort and is not consistent with EPA guidance. EPA disagrees. A summary of our response to each concern is presented below.

- (1) The composites recommended by EPA should meet the DQOs for biota tissue provided in EPA's June 8, 2007, letter to the LWG. The goals of sampling were to meet the FWM biota tissue needs (e.g., validation) and for refining uncertainties in COI tissue concentrations to ensure that the full range of contaminant sources and risks are captured in the tissue sampling. The attached table meets these objectives.
- (2) To meet the DQOs, especially that for validation of the FWM, the mean length of bass from Round 1 and Round 3B should be comparable. The attached table shows the mean length of the bass composites analyzed in Round 1 (289 mm) and the mean length of the composites of bass being proposed by EPA for Round 3B (307 mm). This difference (about 6%) is small relative to all of the other uncertainties in fish collection and analysis.
- (3) For both the Round 1 and Round 3B biota sampling, the high end of the bass target size was 355 mm. It is not clear why this size was selected as the top length limit as the OR Fish and Wildlife fishing regulations allow for collection of 5 bass per day, 3 of which can be greater than 15 inches (381 mm) in length. Furthermore, some bass that were caught but then discarded during the Round 3B sampling effort were quite a bit larger than 355 mm. This information clearly demonstrates that fish greater than 355 mm are caught and eaten. Therefore bass that are longer than 355 mm should not automatically be excluded from a Round 3B bass composite. In fact, 5 of the bass composites from Round 1 have fish that are above the 355 mm in length.
- (4) Consistent with EPA guidance, a goal of compositing for both Round 1 and Round 3B was to form composites using fish that are as close as possible to within 0.75 of each other. As shown in the attached table, most of the EPA proposed Round 3B composites have ratios above 0.75. The ratios range from 0.64 to 0.90. Of the 18 composites, only four of the proposed composites have a ratio less than 0.75. For the Round 1 bass composites, of the 17 composites for which we have information, the ratios ranged from 0.58 to 0.93. Eight of the Round 1 composites had a ratio less than 0.75.

The analysis presented above and in the attached spreadsheet suggests that EPA's

proposed bass compositing scheme will result in a representative data set, is consistent with the Round 1 bass sampling effort and meets the 0.75 size ratio guidance criteria equally as well as those composites formed for Round 1. EPA requests that the LWG composite the bass samples as presented in the attached spreadsheet.

Please let me know if you have any questions.

Thanks, Eric



Round 3B bass composites.xls